

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 05-30057-MAP
)	
V.)	
)	
)	
NAOMI WATFORD,)	
Defendant)	

ASSENTED-TO MOTION FOR TEMPORARY CHANGE
IN TERMS OF PRETRIAL RELEASE

Defendant Naomi Watford, with the assent of the government, respectfully requests that her terms of pretrial release be changed to allow her to travel to Florida. More specifically, she requests the opportunity to leave Massachusetts on December 21, 2006 and return on or before December 28, 2006. In support, she states:

1. Under Ms. Watford's current terms of release, her travel is restricted to the District of Massachusetts.
2. Her brother lives in Palm Bay, Florida. If given permission, Ms. Watford intends to drive with her children to Florida in order to visit her brother in Palm Bay, leaving on December 21 and returning on or before December 28.
3. Pre-trial services is aware that Ms. Watford is making this motion.
4. A.U.S.A. Kevin O'Regan has assented to this motion.

WHEREFORE, Naomi Watford requests that the court allow this temporary change in her travel restrictions, with any special reporting or other conditions as Pretrial Services may set, and with all other terms and conditions to remain in effect.

RESPECTFULLY,
NAOMI WATFORD, By Her Attorney,

s/ Myles Jacobson

Date: December 18, 2006

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